## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,	)
Plaintiff,	)
VS.	)
	) CASE NO. C-1-01-541
BUFORD F. HOUCK, et al.,	)
	) JUDGE MICHAEL H. WATSON
Defendants.	)
	)

## UNITED STATES' OPPOSITION TO DEFENDANT BUFORD F. HOUCK'S MOTION FOR PARTIAL SUMMARY JUDGMENT

The United States relies on its *Motion for Summary Judgment*, filed April 4, 2005 (Docket #71), as an opposition to Defendant Buford F. Houck's *Motion for Partial Summary Judgment*, filed March 28, 2005. The *United States' Memorandum In Support of its Motion for Summary Judgment*, filed April 4, 2005, is fully incorporated herein by reference.

Respectfully submitted,

GREGORY G. LOCKHART United States Attorney

/s/ Alejandro L. Bertoldo
ALEJANDRO L. BERTOLDO
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6019
email: Alejandro.L.Bertoldo@usdoj.gov

## **CERTIFICATE OF SERVICE**

It is hereby certified that the attached *United States' Opposition to Defendant Buford F. Houck's Motion for Partial Summary Judgment* was filed electronically this April 21, 2005. Notice of this filing will be sent to all parties that have registered for electronic filing by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. Service was also made by U.S. Mail, postage prepaid, on the following parties:

State of Ohio, Department of Taxation Tax Commissioner of Ohio 30 East Broad Street, 22 Floor Columbus, OH 43215

First Federal Saving & Loan, Assoc. 415 Center Street Ironton, OH 45638

Buford F. Houck 1739 Kevin Street Ironton, OH 45638

Betty Houck 1739 Kevin Street Ironton, OH 45638

/s/ Alejandro L. Bertoldo
ALEJANDRO L. BERTOLDO
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6019

email: Alejandro.L.Bertoldo@usdoj.gov